

Segal McCambridge

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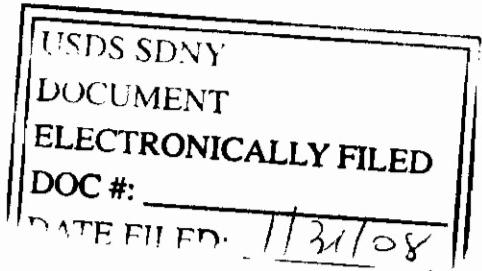
MEMO ENDORSED

VIA FEDERAL EXPRESS

January 29, 2008

Honorable Richard J. Sullivan
United States District Court
Southern District of New York
500 Pearl Street, Room 615
New York, New York 10007

Maria C. Carlucci
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Admitted in New York,
New Jersey & Pennsylvania



Re: Serrano v. Ultradent Products, Inc.
~~Index No.: CV 3685-07~~

Dear Judge Sullivan:

07 CV 3685 (RJS)

As you know, we represent the Defendant Ultradent Products, Inc. in the above-referenced case. This action involves a plaintiff who suffered an eye injury while working as a dental hygienist for a non-party dentist, David Blaustein.

As Defendant represented at the recent November 27, 2007 court conference, we are pursuing the possibility of impleading Mr. Blaustein. The Court orally imposed a February 1, 2008 deadline to implead Mr. Blaustein. Mr. Blaustein's deposition was scheduled for January 28, 2008 but was adjourned to January 31, 2008 due to his schedule. Mr. Blaustein's counsel requested a second adjournment due to a death in his family. The new deposition date is February 11, 2008.

Defendant is respectfully requesting an extension of this February 1st deadline in order to conduct Mr. Blaustein's deposition and determine if a third-party action is warranted. This is the first time that an extension has been requested. I have made two attempts to contact Plaintiff's counsel regarding consent for this extension but have been unable to reach Mr. Tracy. The extension does not affect any other scheduled dates. Moreover, Mr. Blaustein will not be prejudiced by this delay because Plaintiff has yet to provide the initial disclosures (due on December 11, 2007) or the requests for production of documents and interrogatories (due on January 11, 2008).

Sincerely,
SEGAL MCCAMBRIDGE SINGER & MAHONEY, LTD.

Maria C. Carlucci

SO ORDERED
Dated: 1/30/08
RICHARD J. SULLIVAN
U.S.D.J.